

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RAFAELA ESPINAL, Individually and on behalf of
all others similarly situated,

Plaintiff,

v.

DIDI GLOBAL INC. F/K/A XIAOJU KUAIZHI
INC., WILL WEI CHENG, ALAN YUE ZHUO,
JEAN QING LIU, STEPHEN JINGSHI ZHU,
ZHIYI CHEN, MARTIN CHI PING LAU,
KENTARO MATSUI, ADRIA PERICA, DANIEL
YONG ZHANG, GOLDMAN SACHS (ASIA)
L.L.C., MORGAN STANLEY & CO. LLC, J.P.
MORGAN SECURITIES LLC, BOFA
SECURITIES, INC., BARCLAYS CAPITAL INC.,
CHINA RENAISSANCE SECURITIES (HONG
KONG) LIMITED, CHINA INTERNATIONAL
CAPITAL CORPORATION HONG KONG
SECURITIES LIMITED, CITIGROUP GLOBAL
MARKETS INC., GUOTAI JUNAN SECURITIES
(HONG KONG) LIMITED, HSBC SECURITIES
(USA) INC., UBS SECURITIES LLC, BOCCI
ASIA LIMITED, BOCOM INTERNATIONAL
SECURITIES LIMITED, CCB INTERNATIONAL
CAPITAL LIMITED, CLSA LIMITED, CMB
INTERNATIONAL CAPITAL LIMITED, FUTU
INC., ICBC INTERNATIONAL SECURITIES
LIMITED, MIZUHO SECURITIES USA LLC, and
TIGER BROKERS (NZ) LIMITED,

Defendants.

Case No.: 1:21-cv-05807-LAK

Hon. Lewis A. Kaplan

Captioned continued on following page

JATIN CHOPRA, Individually and on behalf of all
others similarly situated,

Plaintiff,

v.

Case No.: 1:21-cv-05973-LAK

Hon. Lewis A. Kaplan

DIDI GLOBAL INC. F/K/A XIAOJU
KUAIZHI INC., WILL WEI CHENG, ALAN YUE
ZHUO, JEAN QING LIU, STEPHEN JINGSHI
ZHU, ZHIYI CHEN, MARTIN CHI PING LAU,
KENTARO MATSUI, ADRIA PERICA, DANIEL
YONG ZHANG, GOLDMAN SACHS (ASIA)
L.L.C., MORGAN STANLEY & CO. LLC, J.P.
MORGAN SECURITIES LLC, BOFA
SECURITIES, INC., BARCLAYS CAPITAL INC.,
CHINA RENAISSANCE SECURITIES (HONG
KONG) LIMITED, CHINA INTERNATIONAL
CAPITAL CORPORATION HONG KONG
SECURITIES LIMITED, CITIGROUP GLOBAL
MARKETS INC., GUOTAI JUNAN SECURITIES
(HONG KONG) LIMITED, HSBC SECURITIES
(USA) INC., UBS SECURITIES LLC, BOCI ASIA
LIMITED, BOCOM INTERNATIONAL
SECURITIES LIMITED, CCB INTERNATIONAL
CAPITAL LIMITED, CLSA LIMITED, CMB
INTERNATIONAL CAPITAL LIMITED, FUTU
INC., ICBC INTERNATIONAL SECURITIES
LIMITED, MIZUHO SECURITIES USA LLC, and
TIGER BROKERS (NZ) LIMITED,

Defendants.

JATIN CHOPRA, Individually and on behalf of all
others similarly situated,

Plaintiff,

v.

DIDI GLOBAL INC. F/K/A XIAOJU
KUAIZHI INC., WILL WEI CHENG, ALAN YUE
ZHUO, JEAN QING LIU, STEPHEN JINGSHI
ZHU, ZHIYI CHEN, MARTIN CHI PING LAU,
KENTARO MATSUI, ADRIA PERICA, DANIEL
YONG ZHANG,

Defendants.

Case No.: 1:21-cv-06603-LAK

Hon. Lewis A. Kaplan

**NOTICE OF MOTION OF FAH LIEW FOR CONSOLIDATION
OF THE ACTIONS, APPOINTMENT AS LEAD PLAINTIFF,
AND APPROVAL OF SELECTION OF COUNSEL**

TO THE CLERK OF THE COURT, ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Fah Liew (“Movant”) respectfully moves this Court for an order: (1) consolidating the above-captioned related actions (the “Actions”), (2) appointing Movant as Lead Plaintiff pursuant to §27 the Securities Act of 1933 (“Securities Act”) and §21D of the Securities Exchange Act of 1934 (“Exchange Act”), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”) and (3) approving Movant’s selection of Levi & Korsinsky, LLP as Lead Counsel for the Class.

Movant seeks consolidation of the Actions, appointment as lead plaintiff, and approval of his choice of counsel pursuant to the Securities and Exchange Acts, the Federal Rules of Civil Procedure, and the PSLRA. This motion is based on this notice, the attached Memorandum of Law, the Declaration of Shannon L. Hopkins in support thereof, and the Court’s complete files and records in this action, as well as such further argument as the Court may allow at a hearing on this motion.

Dated: September 6, 2021

Respectfully Submitted,

LEVI & KORSINSKY, LLP

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*Lead Counsel for Fah Liew and [Proposed]
Lead Counsel for the Class*